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15 *Attorneys for Plaintiff EDGAR SOLIS*

16 **UNITED STATES DISTRICT COURT**  
17  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 EDGAR SOLIS,

20 Plaintiff,

21 v.

22 STATE OF CALIFORNIA; and  
23 MICHAEL BELL,

24 Defendants.

25 Case No.: 5:23-cv-00515-HDV-JPR

26 *Honorable Hernán D. Vera*  
27 Magistrate Judge Jean P. Rosenbluth

28 **DECLARATION OF MARCEL F.  
SINCICH IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTIONS IN  
LIMINE No. 1**

29 **Hearing on Motions in Limine:**

30 October 1, 2024 at 09:00 a.m.

31 **Final Pretrial Conference:**

32 October 8, 2024 at 10:00 a.m.

33 **Jury Trial**

34 October 29, 2024 at 09:00 a.m.

35 Ctrm: 10D

**DECLARATION OF MARCEL F. SINCICH**

I, Marcel F. Sincich, hereby declare as follows:

3       1. I am an attorney duly licensed to practice law in the State of California  
4 and the United States District Court for the Central District of California. I am one  
5 of the attorneys of record for Plaintiff Edgar Solis. I make this declaration in support  
6 of Plaintiff's Opposition to Defendants' Motion *in Limine* No. 1 to Exclude  
7 Evidence and Questions Regarding Officers' Personnel Records. I have personal  
8 knowledge of the facts contained herein and could testify competently thereto if  
9 called.

10        2. Attached hereto as “**Exhibit A**” is a true and correct copy of the letter  
11 sent to Plaintiff by Defense counsel on August 29, 2024, regarding Defendants’  
12 anticipated motions in limine.

13       3. Attached hereto as “**Exhibit B**” is a true and correct copy of the  
14 September 3, 2024, correspondence from Plaintiff’s counsel to Defendants’ counsel,  
15 including regarding Defendants’ then anticipated motions in limine.

17 I declare under penalty of perjury under the laws of the United States that the  
18 foregoing is true and correct. Executed this 24th day of September 2024.

  
Marcel F. Sincich